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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

SMASH TECHNOLOGY, LLC, a Nevada limited liability company; and MICHAEL ALEXANDER, an individual;
Plaintiffs,

vs.

SMASH SOLUTIONS, LLC, a Delaware limited liability company; JERRY "J.J." ULRICH, an individual; SMASH INNOVATIONS, LLC, a Wyoming limited liability company; FERACODE, LLC, a Utah limited liability company; Defendants.

**MOTION TO WITHDRAW AS
COUNSEL**

Case No. 2:19-cv-00105

Judge Tena Campbell
Magistrate Jared C. Bennett

SMASH SOLUTIONS, LLC, a Delaware limited liability company; and JERRY "J.J." ULRICH, an individual;

Counterclaim Plaintiffs,

vs.

SMASH TECHNOLOGY, LLC, a Nevada limited liability company; and MICHAEL ALEXANDER, an individual,

Counterclaim Defendants.

Pursuant to DUCivR 83-1.4, Andrew G. Deiss, Corey D. Riley, and Tawni Bugden of the law firm Deiss Law PC (“Counsel”) move this Court for leave to withdraw as counsel Plaintiffs for Smash Technology, LLC and Michael Alexander (“Clients” or “Plaintiffs”). Clients’ last known address is:

Address: 2450 St. Rose Parkway, Suite 120
City, State, Zip: Henderson, NV 89704
Telephone Number(s): 949-289-9989 or 310-404-5979
E-Mail Address: Michael@michaelalexander.me

Professional considerations and conflicts between counsel and plaintiffs require termination of the representation. These conflicts prevent counsel from being able to represent clients.

In the event this motion is granted, Clients or new counsel for Clients must file a notice of appearance within twenty-one (21) days after entry of the order, unless otherwise ordered by the Court. Pursuant to Utah DUCivR 83-1.3, no corporation, association, partnership, limited liability company or other artificial entity may appear pro se, but must be represented by an attorney who is admitted to practice in this court.

This motion is made without Clients’ consent. The undersigned certifies that the Clients have been served with a copy of this motion and provides the following written description of the status of the case. There are no pending motions or scheduled hearings in the near future. This case is currently in discovery with a discovery deadline of February 5, 2021. A jury trial is scheduled to begin July 26, 2021 with a final pretrial conference scheduled for June 28, 2021.

The specific facts set forth above establish good cause and justify withdrawal of counsel without present appearance of substitute counsel or appearance by the individual party, Mr. Alexander, even though a trial date is set in this case.

CERTIFICATION

Counsel hereby certifies that a copy of this Motion for Withdrawal of Counsel has been sent to the Clients at the address and email address indicated above.

DATED this 28th day of August, 2020.

DEISS LAW

/s/ *Andrew G. Deiss*
Andrew G. Deiss
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the above MOTION TO WITHDRAW AS COUNSEL was eFiled with the CM/ECF court system and thereby served by email on all counsel of record.

DATED: this 28th day of August, 2020

DEISS LAW PC

s/ _____